DANIEL G. BOGDEN 1 United States Attorney District of Nevada SUSAN CUSHMAN Assistant United States Attorney 3 501 Las Vegas Boulevard South **Suite 1100** 4 Las Vegas, Nevada 89101 702-388-6336 5 UNITED STATES DISTRICT COURT 6 DISTRICT OF NEVADA -oOo-7 UNITED STATES OF AMERICA, 8 Case No.: 2:16-cr-0030-JAD-CWH Plaintiff, 9 STIPULATION TO CONTINUE **SENTENCING** VS. 10 (Second Request) JULIAN CRUZ-FLORES, 11 Defendant. 12 13 IT IS HEREBY STIPULATED AND AGREED, by and between Daniel Bogden, 14 United States Attorney; Susan Cushman, Assistant United States Attorney, counsel for the United 15 States of America and Mace Yampolsky, Esq., counsel for defendant, that sentencing in the 16 above-captioned matter currently scheduled to commence on Monday, March 6, 2017, at 10:00 17 a.m. be vacated and continued to a date and time convenient to all parties, but no earlier than 60 18 days. 19 This Stipulation is entered into for the following reason: 20 1. The government needs additional time to determine whether there will be a 21 recommendation for a two-level reduction in the defendant's base offense level for a group plea 22 pursuant to *United States v. Caro*, 997 F.2d 657 (9th Cir. 1993). 23 2. The parties agree to the continuance. 24

1	3. The defendant is in custody and does not object to the continuance	
2	4. This is the second request to continue the sentencing.	
3	DATED this <u>23rd</u> day of February 2017.	
4	Respectfully submitted,	
5	DANIEL G. BOGDEN	
6	United States Attorney	
7	/s/ Susan Cushman	
8	SUSAN CUSHMAN Assistant United States Attorney	
9	/s/ Mace Yampolsky	
10	MACE YAMPOLSKY	
11	Counsel for Defendant	
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UNITED STATES DISTRICT COURT DISTRICT OF NEVADA

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UNITED STATES OF AMERICA,) Case No.: 2:16-cr-0030-JAD-CWH
Plaintiff, vs.) ORDER TO CONTINUE) SENTENCING
ULIAN FLORES-CRUZ,))
Defendant.)

Based on the pending Stipulation of counsel, and good cause appearing therefore, the Court hereby orders that sentencing in the above-captioned matter be vacated and continued until May 16, 2017 at the hour of 9:30 a.m.

DATED this 23rd day of February, 2017.

UNITED STATES DISTRICT JUDGE